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12 FREESCALE SEMICONDUCTOR, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.
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Civil Action No. 4:11-cv-05341 (YGR)

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
FREESCALE SEMICONDUCTOR'S
STIPULATED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP, counsel for
3 Defendant Freescale Semiconductor, Inc. (Freescale). I submit this declaration in support of
4 Freescale's Stipulated Administrative Motion to File Under Seal. I have personal knowledge of
5 the facts set forth in this declaration and, if called to testify as a witness, could and would do so
6 competently.

7 2. Portions of the corrected Freescale's Motion to Exclude Certain Testimony of
8 Catharine M. Lawton (Motion), attached to Errata for Freescale's Motion, include confidential
9 information from the acquisition of the '753 patent that MediaTek Inc. (MediaTek) has
10 designated "Highly Confidential – Attorneys' Eyes Only" Pursuant to the Stipulated Protective
11 Order in this action. Dkt. No. 100. MediaTek is the designating party of this information that
12 Freescale seeks to file under seal in its Motion. MediaTek has submitted the Declaration of MH
13 Shieh In Support of Freescale's Administrative Motion to File Under Seal (Dkt. No. 310) to
14 provide the bases for sealing these portions.

15 3. Portions of the corrected Motion include confidential information on internal
16 product development that Freescale has designated "Highly Confidential – Attorneys' Eyes Only"
17 Pursuant to the Stipulated Protective Order in this action. Freescale has submitted the Declaration
18 of Mark Patrick In Support of Freescale Semiconductor, Inc.'s Stipulated Administrative Motion
19 to File Documents Under Seal (Dkt. No. 302-2) to provide the bases for sealing these portions.

20 4. To comply with the Stipulated Protective Order in this litigation, Freescale
21 redacted those portions of the corrected Motion. These redactions are narrowly tailored to protect
22 only information designated as confidential by Freescale and MediaTek.

23 5. On December 5, 2013, counsel for MediaTek stipulated to Freescale's Motion to
24 file under seal those portions of the corrected Freescale's Motion to Exclude Certain Testimony
25 of Catharine M. Lawton that contain information designated as "Highly Confidential – Attorneys'
26 Eyes Only."

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed this 6th day of December, at Washington, D.C.

3
4 /s/ Michelle Yang
Michelle Yang

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6 **ATTESTATION OF E-FILED SIGNATURE**

7 I, Rudy Y. Kim, am the ECF User whose ID and password are being used to file this
8 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
9 concurred in this filing.

10 Dated: December 6, 2013

/s/ Rudy Y. Kim
Rudy Y. Kim